

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.

Defendant/Third-Party Plaintiff,

v.

JAMES EDWARD STALEY

Third-Party Defendant.

Case Number: 1:22-cv-10019-JSR

GOVERNMENT OF THE UNITED  
STATES VIRGIN ISLANDS,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.

Defendant/Third-Party Plaintiff,

v.

JAMES EDWARD STALEY

Third-Party Defendant.

Case Number: 1:22-cv-10904-JSR

**DECLARATION OF JOHN M. McNICHOLS IN SUPPORT  
OF THIRD-PARTY DEFENDANT JAMES STALEY'S  
MOTION TO EXCLUDE PROFFERED EXPERT OPINIONS**

Pursuant to 28 U.S.C. § 1746, I, John M, McNichols, declare under penalty of perjury as follows:

1. I am a member in good standing of the bar of the State of Maryland, Commonwealth of Virginia, and the District of Columbia. I am one of the attorneys representing Third-Party Defendant James Staley in the above-captioned actions and have been admitted to this Court *pro hac vice*. I am a Partner with the law firm of Williams and Connolly LLP, 680 Maine Ave SW, Washington, DC 20024. I am familiar with the facts set forth herein, and if called as a witness, I could and would competently testify thereto.
2. Attached as Exhibit 1 is a true and correct copy of excerpts of the transcript from the Deposition of Edith Wong, CPA, dated August 23, 2023, designated confidential pursuant to the Protective Order in this matter and filed under seal.
3. Attached as Exhibit 2 is a true and correct copy of Expert Report of Edith Wong, CPA, dated August 8, 2023, and associated exhibits, designated confidential pursuant to the Protective Order in this matter and filed under seal.
4. Attached as Exhibit 3 is a true and correct copy of the Corrected Expert Report of the Hon. Shelley C. Chapman (Ret.), dated August 8, 2023, and associated exhibits, designated confidential pursuant to the Protective Order in this matter and filed under seal.
5. Attached as Exhibit 4 is a true and correct copy of a document produced by JPMorgan Chase Bank, N.A. beginning with Bates stamp JPM-SDNYLIT\_Staley-00001317, designated confidential pursuant to the Protective Order in this matter and filed under seal.
6. Attached as Exhibit 5 is a true and correct copy of excerpts of the transcript from the Deposition of the Hon. Shelley C. Chapman (Ret.), dated August 30, 2023, designated confidential pursuant to the Protective Order in this matter and filed under seal.

7. Attached as Exhibit 6 is a true and correct copy of Expert Report of Carlyn Irwin, dated August 8, 2023, and associated exhibits, designated confidential pursuant to the Protective Order in this matter and filed under seal.

8. Attached as Exhibit 7 is a true and correct copy of excerpts of the transcript from the Deposition of Carlyn Irwin, dated August 31, 2023, confidential pursuant to the Protective Order in this matter and filed under seal

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 20, 2023

/s/ John M. McNichols

John M. McNichols